



C O M M U N I C A T I O N S

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April 12, 2002

Ms. Magalie Roman Salas, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

**Re: CC Docket No. 94-102 / Quarterly TTY Implementation Report
Broadband PCS Stations WPOI260 and WPQL803
MTA12 A2 – Minneapolis, St. Paul, MN
MTA32 B2 – Des Moines-Quad Cities, IA**

Dear Ms. Salas:

Brookings Municipal Utilities d/b/a Swiftel Communications ("Brookings") hereby submits its quarterly report on implementation of TTY access to 9-1-1 over its digital wireless network, pursuant to the Commission's *Fourth Report and Order* in CC Docket No. 94-102, released December 14, 2000.

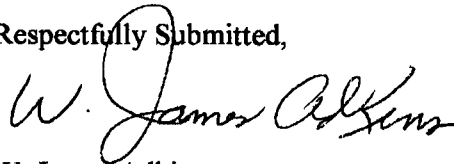
Brookings is using Nortel CDMA base stations and switching equipment in its network. Therefore, we are dependent on Nortel for the provision and installation of the equipment and software necessary to allow our digital wireless network to process 911 calls originating from TTY devices. In this regard, we have received conflicting reports from Nortel sales representatives about the availability of TTY upgrade software for our current DMS-100 Dual Load, Wireless on Wireline switch. In brief, Nortel has made a business decision to discontinue the DMS-100 Dual Load Wireless on Wireline product. The software version that we are currently running on our Dual Load switch (LWW007) includes wireless MTX09, but it is the last software upgrade that Nortel will make available for our switch. Nortel indicated in a regulatory FAQ/RFI sent to its customers in January of this year that TTY capability would be supported by MTX09 switch software, running NBSS 10.1.2 on the base stations. However, Nortel technical staff have recently represented to Brookings that NBSS 10.1.2 (and TTY capability) could not be supported by our Dual Load switch. We are currently researching the correct state of affairs.

Brookings began developing technical specifications for a new wireless switch when it first learned from Nortel that the Dual Load switch may not support TTY capability under any configuration. We are moving ahead with the procurement process with all due haste. However, because Brookings is a municipality, we must follow a competitive bidding process established by the State of South Dakota. Nortel has informally indicated to Brookings that it could provide a new switch within six months of the date of order, if it is the successful bidder.

In our previous quarterly report, dated December 28, 2001, Brookings noted that, despite our best efforts, we were unable to meet the December 31, 2001 deadline by which carriers operating digital wireless systems should have obtained all software upgrades and equipment necessary to make their systems capable of transmitting 911 calls from TTY devices, as specified in the *Fourth Report and Order*. Therefore, we requested a waiver of the December 31, 2001 requirement, to the extent deemed necessary by the Commission.

Brookings will endeavor to implement TTY capability in its markets by the June 30, 2002 deadline, if it is possible to do so using its current Dual Load switch. We will seek a waiver of the TTY implementation deadline if Nortel is unable to deliver an appropriate software solution in timely fashion.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "W. James Adkins". The signature is fluid and cursive, with the first name "W." and last name "Adkins" clearly distinguishable.

W. James Adkins
Technical and Network Operations Manager

Att.

Brookings Municipal Utilities d/b/a Swiftel Communications
E911 TTY Device Capability Report for April, 2002

I. DEVELOPMENT ACTIVITIES

- 1) **Network Infrastructure Software Development** – We continue to be in discussions with our network vendor, Nortel. In this regard, we have received conflicting reports from Nortel sales representatives about the availability of TTY upgrade software for our current DMS-100 Dual Load, Wireless on Wireline switch. The software version that we are currently running on our Dual Load switch (LWW007) includes wireless MTX09, but it is the last software upgrade that Nortel will make available for our switch. Nortel indicated in a regulatory FAQ/RFI sent to its customers in January of this year that TTY capability would be supported by MTX09 switch software, running NBSS 10.1.2 on the base stations. However, Nortel technical staff have recently represented to Brookings that NBSS 10.1.2 (and TTY capability) could not be supported by our Dual Load switch. We are currently researching the correct state of affairs.

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- 2) **Handset Development and Testing Plans** – We are closely following the CDMA handset development and interoperability testing that is being performed by Sprint PCS. We are working with our suppliers to acquire these units as soon as possible.
- 3) **Beta Testing and Lab Testing** – Brookings is a small rural carrier, and is looking to its equipment manufacturers to conduct full beta and lab testing of network software, handsets and infrastructure equipment. However, Brookings will test the equipment it procures as soon as it is available, to make sure it meets the manufacturer's specifications.
- 4) **Release and General Availability to Carriers of Network Infrastructure Software** – See answer to #1, above. We also direct the Commission's attention to Nortel's most recent TTY status report, which we understand will be included in the April 2002 report in CC Docket No. 94-102 by ATIS/TTY Forum.
- 5) **Availability to Carriers of Full Digital Acceptance Test Units** – Unable to determine a firm date at this time with any manufacturer or vendor.
- 6) **Efforts Toward Achieving Digital Wireless Solution Compatibility with Enhanced TTY** – Dependent on handset vendors for enhanced TTY devices.

- 7) **Carrier Coordination of Testing with PSAP** – Brookings will test with the PSAPs in the areas where this service will be deployed. Any coordination with the PSAP will be done on a case-by-case basis, in cooperation with the relevant PSAP personnel.
- 8) **Carrier Testing Activities, Including Field Testing, Consumer and End-to-End Testing, and Other Necessary Tests** – Each of these will be tested once equipment, software availability, deployment, installation, and turn up are completed.
- 9) **Retail Availability of Necessary Consumer Equipment** – Retail availability will be implemented by Brookings when compatible handsets are ready for rollout.
- 10) **Geographic Scope of Network Infrastructure Deployment** – Since our network will have only one switch, as necessary software becomes available, it will be deployed across our whole network. Likewise, as TTY compliant handsets become available we will offer them in all retail locations.